

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**DEFENDANT KHALIFA ALI AL-AKILI'S MEMORANDUM IN MITIGATION OF  
SENTENCE**

Khalifi Ali Al-Akili ("Mr. Al-Akili"), through his counsel,  
Assistant Federal Public Defender Markéta Sims, respectfully  
files the within Memorandum in Mitigation of Sentence

Mr. Al-Akili is a thirty-five year old, married, father of an infant daughter. He faces sentencing on a stipulated sentence of ten years for possessing a Mossberg rifle at the Trafford Sportsmen's Club firing range in Westmoreland County, after having been convicted a felony drug offense in 2000, at the age of twenty-two.

Although Mr. Al-Akili had several convictions in his early twenties, his only conviction in the last ten years was a misdemeanor conviction for retail theft and resisting arrest in 2007.

In recent years, Mr. Al-Akili has settled down, married and had a young daughter. PSR, ¶ 54. A devout Muslim, Mr. Al-Akili supported his family with an internet business selling

books, clothing, oils and perfumes to a largely Muslim clientele. PSR, ¶ 63.

His wife, Hibo Mursal, is a refugee from Somalia, and citizen of the United Kingdom. She remains supportive of him and reports that he is a devoted husband and loving father.

Mr. Al-Akili is politically active and has been critical of the FBI use of informants to infiltrate American Muslim communities and of United States policy toward Afghanistan. He has been questioned on numerous occasions by various law enforcement agencies, including the FBI, concerning his political and religious beliefs.

The present offense came to light when the FBI obtained private emails belonging to a friend of Mr. Al-Akili, who had sent him photographs and videos of their outing to the Trafford Sportsman's club.

The Government has never claimed or maintained that the trip to the Trafford Sportsman's Club was anything other than a recreational outing among friends. Moreover, the firearm Mr. Al-Akili possessed was not brought by him to the Trafford Sportsman's Club, but belonged to one of his friends, who brought it to the range.

Based upon the foregoing facts and circumstances, the stipulated sentence of ten years, is warranted and just.

Respectfully submitted,

s/ Markéta Sims  
Markéta Sims  
Assistant Federal Public Defender  
Attorney Pa. I.D. No. 66325